

**Commonwealth of Kentucky  
Environmental and Public Protection Cabinet  
Department for Environmental Protection  
Division for Air Quality  
803 Schenkel Lane  
Frankfort, Kentucky 40601  
(502) 573-3382**

**AIR QUALITY PERMIT  
Issued under 401 KAR 52:040**

**Permittee Name:** ZF Sachs Automotive of America, Inc.

**Mailing Address:** 15 Spiral Drive, Florence, KY 40142

**Source Name:** Same as above

**Mailing Address:** Same as above

**Source Location:** 15 Spiral Drive, Florence, KY 40142

**Permit Number:** S-06-027

**Source A. I. #:** 242

**Activity #:** APE20050003

**Review Type:** Operating, MACT

**Source ID #:** 21-015-00103

**Regional Office:** Florence Regional Office  
8020 Veterans Memorial Drive, Suite 110  
Florence, KY 41042  
(859) 525-4923

**County:** Boone

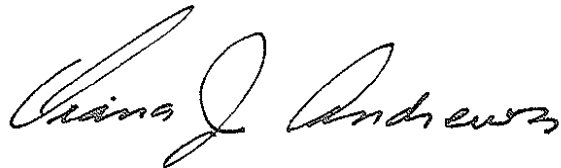
**Application**

**Complete Date:** October 20, 2005

**Issuance Date:** March 17, 2006

**Revision Date:** NA

**Expiration Date:** March 17, 2016



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**John S. Lyons, Director  
Division for Air Quality**

## **SECTION A - PERMIT AUTHORIZATION**

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the construction and operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

## **SECTION B - AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**

**Emission Point: 01 (003)     Electrocoat Paint Line**

**Description:**                      Electrodeposition Tank and  
Bake Oven for Coating of Miscellaneous Metal Parts  
Construction commenced: 1990

### **APPLICABLE REGULATIONS:**

**401 KAR59:225**, New miscellaneous metal parts and products surface coating operations. Due to use of color coat containing less than 3.0 lbs/gal of VOC, the affected facility is exempt from requirements of Section 3, as provided for in Section 6(c).

**1.     Operating Limitations:**

To qualify for an exemption from control requirements of Regulation 401 KAR 59:225, Section 3, the affected facility shall use a coating containing less than 3.0 lb of VOC per gallon.

**2.     Emission Limitations:**

None

**3.     Testing Requirements:**

If deemed necessary by the cabinet samples of coatings may be obtained to verify that they meet requirements of Regulation 401 KAR 59:225, Section 6.

**4.     Specific Monitoring Requirements:**

None

**5.     Specific Recordkeeping Requirements:**

**401 KAR59:225**, Section 4

Daily records shall be maintained by the source for the most recent two (2) year period. These records shall include, but not be limited to:

- a. Applicable regulation number;
- b. Application method and substrate type;
- c. Amount and type coating (including catalyst and reducer for multi component coatings), or solvent used at each point of application, including exempt compounds;
- d. The VOC content as applied in each coating or solvent;
- e. The date for each application for coating or solvent;
- f. The amount of surface preparation, clean-up, or wash-up solvent (including exempt compounds) used and the VOC content of each;
- g. Oven temperature.

**6.     Specific Reporting Requirements:**

See Section C

**SECTION B - AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****Emission Point: 14 ( - )****Chrome Plating****Description:**

Chrome plating tank containing an electrolytic etch station, three hard chrome plating stations, and a chrome deposit station (the deposit station is not regulated)

Cumulative Rectifier amp-hours/yr: 341.04 million (Large, hard chrome electroplating facility)

Construction commenced: February 15, 1999

**Control Equipment:**

Packed Bed Scrubber and Demister

Velocity Pressure at Inlet to Scrubber: 0.4 in. W.C.

Pressure Drop across Scrubber: 4.1 in. W.C.

Exhaust Rate: 151 dscm/min.

**APPLICABLE REGULATIONS:**

**40 CFR 63 Subpart N** – National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks

**1. Operating Limitations:**

The permittee shall prepare an operation and maintenance plan to be implemented upon startup. (This plan is incorporated by reference into this permit) §63.342 (f)(3)

If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.

If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the division.

The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the division for the life of the affected source or until the source is no longer subject to the provisions of 40 CFR 63 Subpart N. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the division for a period of 5 years after each revision to the plan. The requirements for the plan may be met using applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements outlined below.

## **SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

The plan shall include the following elements:

- a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device, and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment;
- b. The plan shall incorporate the work practice standards for the device and monitoring equipment as identified in §63.342 Table 1 (included in Appendix A of this permit).
- c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and
- d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions.

The control equipment shall be operated at all times that the chromium bath is in operation.

### **2. Emission Limitations:**

Chromic Acid emissions shall not exceed 0.0124 mg/dscm of ventilation air. §63.344(e)(4)

### **Compliance Demonstration Method:**

Compliance is demonstrated by monitoring control device operating parameters established during the initial compliance demonstration.

### **3. Testing Requirements:**

Any testing to determine chromium emissions shall be done according to test methods detailed in §63.344 (c).

### **4. Specific Monitoring Requirements:**

- a. The permittee shall install, calibrate, maintain and operate according to manufacturer's specification a monitoring device to determine the chromium concentration during operation of the tank. Operating parameters for this device shall be established according to the requirements in §63.344 (d).
- b. Packed-bed scrubber:  
The permittee shall monitor the velocity pressure at the inlet to the packed-bed scrubber and the pressure drop across the scrubber once per 24-hour period that any affected source is operating, across the scrubber system. The scrubber system shall be inspected in accordance with the work practice standards as established in §63.342(f)(3)(b)

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****5. Specific Record keeping Requirements:**

§63.346

The owner or operator shall maintain the following records for the source for a period of 5 years:

- a. Inspection and maintenance records for the packed-bed scrubber, the affected source, and all associated monitoring equipment;
- b. The occurrence, duration and cause of each malfunction of the process, packed-bed scrubber, monitoring equipment, and actions taken;
- c. Actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;
- d. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan;
- e. Test reports which document the results of all performance tests;
- f. All measurements necessary to determine the operating conditions of performance test and monitoring data as required above.
- g. Monitoring data required by §63.343 (c) that are used to demonstrate compliance with the standard including the date and time the data are collected;
- h. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emission, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment;
- i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emission, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment;
- j. The total process operating time of the affected source during the reporting period.

**6. Specific Reporting Requirements:**

§63.347 (g)(3)

The permittee shall submit semi-annually, an ongoing compliance status report. The report shall contain the following information:

- a. Company name and address of the affected source;
- b. Identification of the operating parameter that is monitored for compliance determination;
- c. The relevant emission limitation for the affected source, and the operating parameter value, or range of operating parameter values, that correspond to compliance with this emission limitation;
- d. The beginning and ending dates of the reporting period;
- e. A description of the type of process performed in the affected source;
- f. The total operating time of the affected source during the reporting period;
- g. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

- h. A certification by a responsible official, that the work practice standards in §63.342(f) were followed in accordance with the operation and maintenance plan for the source;
- i. If the operation and maintenance plan was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by §63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed;
- j. A description of any changes in monitoring, processes, or controls since the last reporting period;
- k. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
- l. The date of the report.

## **SECTION C - GENERAL CONDITIONS**

### **A. Administrative Requirements**

1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
2. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15]
3. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Material incorporated by reference by 401 KAR 52:040, Section 1a, 11].
4. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition [Material incorporated by reference by 401 KAR 52:040, Section 1a, 4,5].
5. This permit does not convey property rights or exclusive privileges [Material incorporated by reference by 401 KAR 52:040, Section 1a, 8].
6. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:040 Section 11(3)].
7. This permit shall be subject to suspension at any time the permittee fails to pay all fees within 90 days after notification as specified in 401 KAR 50:038, Air emissions fee. The permittee shall submit an annual emissions certification pursuant to 401 KAR 52:040, Section 20.
8. All previously issued permits to this source at this location are hereby null and void.



**SECTION C - GENERAL CONDITIONS (CONTINUED)****B. Recordkeeping Requirements**

1. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:040 Section 3(1)(f)].
2. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

**C. Reporting Requirements**

1. a. In accordance with the provisions of 401 KAR 50:055, Section 1, the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
  - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
  - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
- b. The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition 1. a. above), the probable cause of the deviation, and corrective or preventive measures taken; to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report [Material incorporated by reference by 401 KAR 52:040, Section 5, 3].
2. The permittee shall furnish information requested by the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the permit [Material incorporated by reference by 401 KAR 52:040, Section 1a, 6].
3. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation.

The summary reports are due January 30th and July 30th of each year. All deviations from permit requirements shall be clearly identified in the reports. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

## **SECTION C - GENERAL CONDITIONS (CONTINUED)**

### **D. Inspections**

1. In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times. Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency:
  - a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation.
  - b. To access and copy any records required by the permit.
  - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit.
  - c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

### **E. Emergencies/Enforcement Provisions**

1. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Material incorporated by reference by 401 KAR 52:040, Section 1a, 3].
2. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
  - a. An emergency occurred and the permittee can identify the cause of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
  - d. The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
3. Emergency provisions listed in General Condition E.2 are in addition to any emergency or upset provision contained in an applicable requirement [401 KAR 52:040, Section 22(1)].
4. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 52:040, Section 22(2)].

**SECTION C - GENERAL CONDITIONS (CONTINUED)****F. Compliance**

1. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
  - a. Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
  - b. All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and nonroutine maintenance performed on each control device.
  - c. A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division [401 KAR 50:055, Section 2].
2. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:
  - a. Identification of the term or condition;
  - b. Compliance status of each term or condition of the permit;
  - c. Whether compliance was continuous or intermittent;
  - d. The method used for determining the compliance status for the source, currently and over the reporting period, and
  - e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
  - f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the following addresses:

Division for Air Quality	Division for Air Quality
Florence Regional Office	Central Files
8020 Veterans Memorial Drive, Suite 110	803 Schenkel Lane Suite 110
Florence, KY 41042	Frankfort, KY 40601
3. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
  - (a) Applicable requirements that are included and specifically identified in this permit; or
  - (b) Non-applicable requirements expressly identified in this permit [401 KAR 52:040, Section 11].

**SECTION C - GENERAL CONDITIONS (CONTINUED)**

**G. Construction Requirements:**

None

**SECTION D - INSIGNIFICANT ACTIVITIES**

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. While these activities are designated as insignificant the permittee shall comply with the applicable regulation and any level of periodic monitoring specified below.

	<u>Description</u>	<u>Generally Applicable Regulation</u>
1.	Weld Machine # U10170	401 KAR 59:010
2.	Weld Machine # U20210	401 KAR 59:010
3.	Weld Machine # U20230	401 KAR 59:010
4.	Weld Machine # 22250	401 KAR 59:010
5.	Weld Machine # U22100	401 KAR 59:010
6.	Weld Machine # U25120	401 KAR 59:010
7.	Weld Machine # U25200	401 KAR 59:010
8.	Weld Machine # U26100	401 KAR 59:010
9.	Weld Machine # U26200	401 KAR 59:010
10.	Weld Machine # U65110	401 KAR 59:010
11.	Weld Machine # U65100	401 KAR 59:010
12.	Weld Machine # U65105	401 KAR 59:010
13.	Weld Machine # U65100	401 KAR 59:010
14.	Weld Machine # U28150	401 KAR 59:010
15.	Weld Machine # U28200	401 KAR 59:010
16.	Weld Machine # U28300	401 KAR 59:010
17.	Weld Machine # U29100	401 KAR 59:010
18.	Weld Machine # U29100	401 KAR 59:010
19.	Weld Machine # U29200	401 KAR 59:010
20.	Weld Machine # U65115	401 KAR 59:010

**SECTION D - INSIGNIFICANT ACTIVITIES (CONTINUED)**

- |     |                                              |                |
|-----|----------------------------------------------|----------------|
| 21. | EIS #005 Natural Gas Boiler<br>4 MMBtu/hr    | 401 KAR 59:015 |
| 22. | Bulk Oil Tanks<br>(<10, 567 Gals, VP<1.5psi) | None           |
| 23. | Laboratory Fume Hoods<br>(Chem/phys)         | None           |